

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

IRAIDA LIMA-RIVERA; et als	*	CIVIL NO. 04-1798 (DRD)
Plaintiff	*	
v.	*	
UHS OF PUERTO RICO, INC., et als	*	
Defendants	*	

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**INFORMATIVE MOTION AS TO FILING OF SETTLEMENT AGREEMENT**

TO THE HONORABLE COURT:

COME NOW plaintiffs through the subscribing attorney and very respectfully informs and request:

1. Having the parties reached a settlement agreement in the instant case and so having verbally informed it to Magistrate Judge McGiverin, the Court ordered the corresponding settlement agreement to be filed by today, June 6, 2007.

2. Plaintiffs prepared and notified a settlement agreement document to all counsel for defendants and days after followed-up the notification with personal visits to the defendants' counsel offices to secure their respective signatures. To this date plaintiffs have secured the signatures of attorneys Sigrid López-González for UHS of PR Inc.;, Milagros del Carmen López for Dr. Mariela Stacholy-Ramos; Fernando E. Agrait for HIMA; Luis R. Lugo-Emanueli for Dr. Roberto Flores-Vázquez and Gilda Cruz Martinó for SIMED.

3. Brother counsel Igor Domínguez-Pérez has been unable to sign the agreement because his client, Dr. Luis Pérez-Cruz, is still to sign the authorization documents to his insurance company, although we have been informed by both brother counsel Domínguez and the insurance company's counsel, Gilda Cruz Martinó, that he verbally agreed and authorized the settlement. Brother counsel Domínguez has been in constant communication with the subscriber and has informed us that his client is out of the country this week and will be back next Monday, when he expects to have the authorization document signed by his client.

4. Brother counsel Pedro J. Córdova, Dr. Basilisa Rivera Rodríguez' counsel, is out of the country. In his absence, we have had the benefit of his partner's, attorney José Miranda-Daleccio, continuous attention. Notwithstanding Mr. Miranda's efforts, the fact is that he informed the subscriber that he could not find in his case file his client's written authorization and is in the process of communicating with the insurance company in order to secure the same.

5. Plaintiffs acknowledge the efforts being made by both brother counsels, Domínguez and Miranda, to have the necessary documentation in order to proceed with the signing of the settlement agreement. Since the problem stems from coordination and not from authorization, plaintiffs respectfully request this Honorable Court to grant the parties an extension of time to file the settlement agreement until next Friday, June 15, 2007.

WHEREFORE, it is respectfully requested from this Honorable Court to grant an extension of time to file the settlement agreement until next Tuesday,

June 15, 2007.

RESPECTFULLY SUBMITTED

I HEREBY CERTIFY: that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification to the following attorneys: Ricardo Ruiz Díaz, Esq., Sigrid López González, Esq.; Gilda del C. Cruz Martinó, Esq.; Igor J. Domínguez, Esq.; Fernando E. Agrait, Esq.; Luis R. Lugo Emanuelli, Esq. ; Milagros del Carmen López, Esq. ; Fernando E. Agrait, Esq. and Orlando H. Martínez Echevarría, Esq.

In San Juan, Puerto Rico, this 6<sup>th</sup> day of June, 2007.

S/Carlos A. Ortiz Morales  
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